## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

HARRY VERNON, :

:

Plaintiff,

.

vs. : No. 2:18-CV-03902-ER

:

INTERNATIONAL PAPER COMPANY :

and OWENS-ILLINOIS, INC.,

:

Defendants.

# DEFENDANT OWENS-ILLINOIS, INC.'S MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF ITS MOTION TO DISMISS PLAINTIFF'S AMENDED COMPLAINT UNDER FED. R. CIV. P. 12(B)(6) FOR FAILURE TO STATE A CLAIM

Owens-Illinois, Inc. moves for leave to file a reply in support of its motion to dismiss Plaintiff's Amended Complaint under Fed. R. Civ. P. 12(b)(6) for failure to state a claim. The relief is warranted to address the arguments Plaintiff raised as to choice of law and his request for leave to file an amended complaint.

Dated: November 14, 2018 Respectfully submitted,

/s/ Brian O. Watson

#### MARON MARVEL BRADLEY ANDERSON & TARDY LLC

Chad D. Mountain, Esquire (86908) Three Logan Square 1717 Arch Street, Suite 3710 Philadelphia, PA 19103

### RILEY SAFER HOLMES & CANCILA LLP

Robert H. Riley (admitted *pro hac vice*) Edward Casmere (admitted *pro hac vice*) Joshua D. Lee (admitted *pro hac vice*) Brian O. Watson (admitted *pro hac vice*) Three First National Plaza 70 W Madison St, Ste 2900 Chicago, Illinois 60602

Attorneys for Owens-Illinois, Inc.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on November 14, 2018, I served a true and correct copy of these papers upon all counsel of record via electronic filing. These documents have been electronically filed and are available for viewing and downloading from the CM/ECF system.

/s/ Brian O. Watson
Attorney for Owens-Illinois, Inc.